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16 UNITED STATES DISTRICT COURT  
17 DISTRICT OF NEVADA

19 NAVAJO HEALTH FOUNDATION - SAGE  
20 MEMORIAL HOSPITAL, INC. (doing business as  
21 "Sage Memorial Hospital"), an Arizona non-profit  
corporation,

22 Plaintiff,

23 vs.

24 RAZAGHI DEVELOPMENT COMPANY, LLC  
25 (doing business as "Razaghi Healthcare"), a Nevada  
limited liability company; AHMAD R. RAZAGHI,  
26 individually; TAUSIF HASAN, individually;  
DOES 1-20; DOES A-Z,

27 Defendant.  
28

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND  
TIME FOR PLAINTIFF TO FILE  
AMENDED COMPLAINT**

**(SECOND REQUEST)**

1 Pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule 7-2, Plaintiff Navajo Health Foundation -  
2 Sage Memorial Hospital, Inc. ("Sage Memorial") and Defendants Razaghi Development Company,  
3 LLC, Ahmad Razaghi, and Tausif Hasan (collectively, "Razaghi Defendants") stipulate and agree to  
4 extend the time for Sage Memorial to file its Amended Complaint for sixteen days, from May 5, 2021  
5 to May 21, 2021. This is the second request to extend the time to file Sage Memorial's amended  
6 complaint. On March 15, 2021, the Court entered an Order permitting Sage Memorial to file an  
7 amended complaint curing deficiencies identified in the Order. ECF No. 128 at 34. As a result, Sage  
8 Memorial's amended complaint was initially due to be filed on April 5, 2021. On April 1, 2021, the  
9 Court granted the parties' first stipulation to extend the time for Sage Memorial to file its amended  
10 complaint until May 5, 2021. ECF No. 131.

12 Additional time to file the amended complaint has now become necessary for the following  
13 reasons:

14 1. The undersigned counsel for Sage Memorial is primarily responsible for drafting Sage  
15 Memorial's amended complaint. He is also counsel for plaintiffs ("9/11 Families") who hold a  
16 multi-billion dollar judgment against the Islamic Republic of Iran and certain of its political  
17 subdivisions and its agencies and instrumentalities arising out of Iran's material support for the  
18 September 11, 2001 terrorist attacks.

20 2. Counsel for Sage Memorial is currently involved in representing the 9/11 Families in a  
21 judgment enforcement proceeding in Luxembourg against Iran.

23 3. In connection with the Luxembourg judgment enforcement proceeding, counsel for  
24 Sage Memorial is currently reviewing approximately five hundred mostly single-spaced pages of  
25 briefs and expert reports that must be filed at the Luxembourg Court of Appeals on May 15,  
26 2021.

